

1.0 Introduction

This volume of the revised draft Hanford Solid Waste Environmental Impact Statement (HSW EIS) consists of responses to comments the U.S. Department of Energy (DOE) received on the first draft HSW EIS. Scoping comments and DOE summary-level responses are found in Appendix A of HSW EIS Volume II. The public comment and related processes are described below.

1.1 Background

DOE approved the first *Draft Hanford Site Solid (Radioactive and Hazardous) Waste Program Environmental Impact Statement, Richland, Washington* (DOE-RL 2002a) in April 2002. The purpose of the HSW EIS was to assess potential impacts from a range of alternatives to receive, process, treat, store, and dispose of radioactive solid wastes generated at Hanford and received from other DOE sites. The document provided the results of analyses performed to help decision makers and the public understand the potential environmental impacts of the described alternatives and options. The first draft EIS was distributed to the public in May 2002, and the U.S. Environmental Protection Agency (EPA) announced the availability of the draft HSW EIS for public review and comment in the *Federal Register* on May 24, 2002 (67 FR 36592); this announcement began a 90-day comment period that ended on August 22, 2002.

Commenters were invited to submit their comments by regular mail, electronic mail (email), facsimile transmission (faxes), and at six public hearings at five different locations. Table 1.1 lists the locations and dates of the public hearings. DOE representatives were available for a one-hour period prior to each meeting to answer questions.

DOE received over 3,800 comments on the first draft HSW EIS from federal agencies; state, local, and tribal governments; public and private organizations; and individuals. These comments were presented as recorded statements at the public hearings shown on Table 1.1 (the statement of each speaker is a separate comment document), or in written documents submitted at those hearings or sent to DOE by regular mail, email, and fax.

DOE thanks those who provided comments on the first draft HSW EIS. We have prepared a revised draft of the HSW EIS to address these comments. This revised draft HSW EIS reflects the considerable input from federal and state regulators, as well as from other stakeholders, with the aim of ensuring that critical issues are addressed. The revised draft contains a range of changes that respond to the fundamental concerns raised in these comments by:

- adding new immobilized low-activity waste (ILAW) disposal alternatives
- addressing regulatory and stakeholder concerns by expanding the range and depth of alternatives analyzed
- distinguishing between “Hanford Only” waste volumes and those projected to originate offsite

Table 1.1. Public Hearings Related to the Draft HSW EIS

Date	Time	City	Facility
July 23, 2002	7:00 – 9:00 pm	LaGrande, OR	Best Western
July 30, 2002	7:00 – 9:00 pm	Portland, OR	Metro Regional Service Building
August 6, 2002	7:00 – 9:00 pm	Richland, WA	Hanford House
August 7, 2002	7:00 – 9:00 pm	Seattle, WA	The Mountaineers Club
August 14, 2002	7:00 – 9:00 pm	Hood River, OR	Best Western Hood River Inn
August 21, 2002	7:00 – 9:00 pm	Portland, OR	Metro Regional Service Building

- describing more fully how transporting waste could impact Washington and Oregon
- expanding our discussion of cumulative impacts including those affecting the groundwater
- expanding our discussion of potential groundwater contamination for each alternative and providing additional information
- discussing the relationship of the HSW EIS to the rest of the Hanford Site and DOE complex.

This Comment Response Document (CRD) includes all of the comments on the first draft HSW EIS that DOE received through August 22, 2002, and the DOE responses to those comments. DOE also responded to comments received after that date as much as practicable. This document contains electronic images of all comment documents (including transcripts for each commenter at the public hearings) that DOE received on the draft HSW EIS. These images include vertical bars numbered to identify the comments to which DOE has responded.

Tables A.1 and A.2 in Appendix A (of this Volume III of the HSW EIS) provide locations in the document for all of the comments received from organizations and individuals, respectively. On several occasions, speakers at public hearings represented other individuals. In such cases, the tables list the person who spoke at the hearing.

1.2 Methodology

Although there were a large number of submittals (letters, emails, faxes, comment forms, public hearing transcripts) received during the public comment period on the first draft HSW EIS, DOE elected, initially, to respond individually to each comment of each submittal. This approach would enable DOE to be more responsive, individually and collectively, to all comments received. However, after reviewing the comments, it was evident there were many duplicate or similar comments. Therefore, for the organizational and individual comments, DOE decided to group these comments and provide a single response.

The following list highlights key aspects of the DOE approach to capturing, tracking, and responding to comments:

- DOE read all comment documents and their attachments to identify and extract comments. As a part of this process, DOE also reviewed technical attachments (e.g., reports) for potential applicability to the HSW EIS. After comment identification, DOE grouped individual comments and assigned each group of comments to an expert in the appropriate discipline to prepare a response. Responses were reviewed for technical and scientific accuracy, clarity, and consistency, and to ensure that they fully answered the comments.
- When more than one commenter submitted identical or similar comments, DOE prepared a response for each comment. However, duplicate comments received duplicate responses, for consistency. Duplication of responses was appropriate because of the content and number of comments received.
- To the extent practicable, this CRD presents the comments extracted from comment documents as stated by the commenters. That is, with the exception of correcting obvious errors and other minor modifications (see next bullet), DOE has neither edited nor rewritten the comments submitted.
- DOE did not modify certified transcripts of public hearings. However, some transcripts contained obvious errors (for example, misspelled names or words). The complete transcripts are included in Appendix A of this Volume III of the HSW EIS.
- DOE tried to be fully responsive to all comments received on the first draft HSW EIS. When the meaning of a comment was not clear, DOE made a reasonable attempt to interpret the comment and respond based on that interpretation. In such cases, the response is preceded by a statement of the DOE interpretation of the comment.

1.3 Public Involvement and Comment Acquisition

DOE has made extensive efforts to keep the public aware of the development of the HSW EIS and to allow the public opportunities to review and comment on drafts of the document. DOE used an open process and multiple means for inviting and receiving comments.

1.3.1 First Draft HSW EIS

The public involvement process for the first draft HSW EIS consisted of several outreach efforts:

- mailing postcards to over 3,000 interested individuals and organizations announcing the release of the first draft HSW EIS
- holding pre-notification meetings with tribal representatives, regulatory agencies, the Hanford Advisory Board (HAB), and others
- publishing the first HSW EIS in the (EPA's) Notice of Availability in the May 24, 2002 *Federal Register*

- mailing fact sheets to over 3,000 interested individuals and organizations
- distributing over 1000 copies of the draft HSW EIS summary or full document
- placing newspaper advertisements to announce public hearings in Tri-Cities, Walla Walla, Yakima, Hood River, The Dalles, Camas, Goldendale, Pendleton, Portland, Seattle, Spokane, and Boise.

DOE invited the general public, other federal agencies, tribal, state, and local governments to provide comments on this draft HSW EIS. The public comment period began on May 24, 2002 and extended through August 22, 2002.

During the review period, DOE held six public hearings (see Table 1.1). The format for the hearings included an opportunity for informal discussions with project personnel before and after the formal presentation. Comments were heard on a first come, first served basis. DOE encouraged those providing oral comments at the hearings to also submit them in writing.

1.3.2 Revised Draft HSW EIS

This revised draft HSW EIS has been distributed for review and comment to the general public, members of Congress, appropriate federal agencies, and affected state, tribal, and local governments. The revised draft HSW EIS has been prepared to address new waste management alternatives that have been proposed since the first draft HSW EIS was issued in April 2002 (DOE 2002a). In response to public comments and because of substantial changes relative to the first draft HSW EIS, DOE elected to issue a revised draft for public comment rather than proceeding with preparation of the final HSW EIS (68 FR 7110). The public involvement process is expected to be similar to that for the first draft HSW EIS. It also incorporates alternatives for onsite disposal of ILAW.

1.3.3 Organization of Public Comments and Responses

DOE assessed and considered all public comments received on the first draft HSW EIS, both individually and collectively. DOE developed a database to track and manage all comments received on the first draft HSW EIS. All comments received were categorized and assigned a unique identification number in accordance with the numbering system described in Table 1.2.

DOE distributed the revised draft HSW EIS primarily as a printed summary with CDs containing the full document. Full copies of the printed document were made available on request.

Table 1.2. Comment Numbering System

Letters		
Mass-Mailing Letters	As with postcards, all letters consisting of identical text were grouped together under one identifier. Each mass-mailing letter group has its own identifier starting with ML (e.g., ML001, ML002, etc.).	<u>Received</u> ML001 ML002 ML003
Mass-Mailing Letters with Comments	These letters were grouped the same as above but, in addition to the group number, they have an extension number that identifies each letter individually. The ML number identifies which mass-mailing group it is from; the extension shows the individual record. Comments are identified by bar codes and numbered consecutively.	<u>Received</u> ML002-01 through ML002-30
Individual Letters	These letters are unique and not related to any mass mailings. Each will receive a unique identifier starting with L. Comments will be identified by bar codes and numbered consecutively (e.g., L001, L002, L003, etc.).	<u>Received</u> L001 – L098 L100 – L106
Postcards		
F.3.3.1.1.1 Mass Postcard Mailings	All postcards consisting of identical text were grouped together under one identification number (identifier). Each mass-mailing postcard group was given its own identifier starting with MP (e.g., MP001, MP002, etc.).	<u>Received</u> MP001 MP002
F.3.3.1.1.2 Mass Postcards with Comments	These postcards were grouped the same as above but in addition to the group number they were given an extension number to identify each card individually. The MP number identifies which mass-mailing group it is from; the extension shows the individual record. Comments were identified by bar codes and numbered consecutively (e.g., MP001-01, MP001-02, or MP002-1, etc.).	<u>Received</u> MP001-01 through MP001-61 MP002-01 through MP002-27 MP003-01 through MP003-153
Individual Postcard Mailings	All postcards consisting of comments composed by stakeholders not related to a mass mailing. Each received a unique identifier starting with P. Comments were identified by bar codes and numbered consecutively (e.g., P001, P002, etc.).	<u>Received</u> P001 – P011
Email		
Mass Email Letters	As with postcards and letters, all letters received over email consisting of identical text were grouped together under one identifier. Each mass-mailing letter group had its own identifier starting with ME (e.g., ME001, ME002, etc.).	<u>Received</u> ME001

Table 1.2 (contd)

Mass Email Letters with Comments	These letters were grouped the same as above but, in addition to the group number they have an extension number that identifies each letter individually. The ME number identifies which mass-mailing group it is from; the extension shows the individual record. Comments were identified by bar codes and numbered consecutively (e.g., ME001-1, ME001-2, or ME002-1, etc.).	<u>Received</u> ME001-01 through ME001-09
Individual Email Letters	These letters are unique and not related to any email mass mailings. Each received a unique identifier starting with E. Comments were identified by bar codes and numbered consecutively (e.g., E001, E002, E003, etc.).	<u>Received</u> E001 – E052
Public Hearing Transcripts		
Individual Commentary	Each individual who provided comments during the official comment period received a unique identifier starting with an abbreviation representing the city where the public meeting was held. Comments were identified by bar codes and numbered consecutively (e.g., PDA001, PDB001, SEA001, LG001, HR001, etc.).	<u>Received</u> LG001 – LG031 PDA001 – PDA035 RL001 – RL009 SEA001 – SEA049 HR001 – HR022 PDB001 – PDB027
Written Comments	All comments written on public meeting forms, whether submitted at a public meeting or mailed in received a unique identifier starting with the letter F. Comments were identified by bar codes and numbered consecutively (e.g., F001, F002, F003, etc.).	<u>Received</u> F001 – F086

1.4 Organization of this Comment Response Document

This CRD contains the comments received on the first draft HSW EIS and DOE responses. DOE responded to each comment. This document is organized by commenting organization or individual commenter because it contains every comment DOE received and the DOE responses, as follows:

- Section 3.1 Federal Agency Comments and Responses
- Section 3.2 State Agency Comments and Responses
- Section 3.3 Native American Tribal Comments and Responses
- Section 3.4 Congressional and Other Governmental Organizations Comments and Responses
- Section 3.5 Hanford Advisory Board Comments and Responses
- Section 3.6 Responses to Other Organizations and Individuals
- Section 3.7 Generic Responses to Organizations and Individuals.

A number of the responses to comments refer to supporting documents. The reference list in this CRD includes only the documents cited in this volume of the HSW EIS. References cited in other volumes of the HSW EIS are listed in those volumes.

1.5 How to Use this Comment Response Document

Tables A.1 and A.2 in Appendix A in this Volume III of the HSW EIS provide alphabetical guides to the location of comments provided by organization and individual name, respectively. Table A.2 lists anonymous submittals as “Unidentified” and lists as “Illegible” submittals for which DOE could not read the signature. To find a comment and the DOE response, locate the commenter’s name (by organization or individual) in Table A.1 or A.2, respectively, and turn to the CRD page where the response is provided. The identification number after the Document ID identifies the response number. As an actual example, the Washington State Department of Ecology submitted two letters (Document Identification Number L089 and L095) that contain comments appearing in Section 3.2 (State Agency Comments and Responses) of this document. Alternatively, if one wanted to read the DOE responses to comments received from Earl Blumenauer, Congressional Representative from Oregon, one would first find the name of that individual in Table A2. In addition to the individual’s name, the table includes the document number (L088 in Congressman Blumenauer’s case) and the CRD section in which the response can be found (Section 3.4, Congressional and Other Governmental Comments and Responses).

Sections 3.1, 3.2, 3.3, and 3.4 contain both the letters and corresponding responses. Sections 3.5, 3.6, and 3.7 contain only the responses. The comment documents are reproduced in Appendix B.

